

THE HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

TRINA CHRISTIE, in her Personal Capacity  
and as Personal Representative of the Estate of  
ANTHONY R. CHRISTIE, deceased; C.C., a  
minor, in his personal capacity,

Plaintiffs,

v.

STATE OF WASHINGTON, DEPARTMENT  
OF CORRECTIONS; JULIE MARTIN; ROB  
HERZOG; DAN JOHNSON; JACK WARNER;  
CHRISTOPHER HALLGREN; STEFAN  
ROSE; KODY ANGELL; JOHN GEISLER;  
RADU MURESAN; WILLIAM HALL;  
DIANNA MULL; ARBEN KULLOJKA;  
VALARIE HERRINGTON; TROY BUSHEY;  
AREIG AWAD; JACOB MILLER; ELAINE  
GRAVATT; and JOHN DOES 1-20,

Defendants.

NO. 3:22-cv-05692-BHS

**STIUPLATED MOTION AND ORDER  
TO EXTEND DEADLINE FOR  
SERVICE ON DEFENDANT DAN  
JOHNSON**

NOTING DATE: December 15, 2022

The Parties, having met and conferred by and through counsel, hereby stipulate and agree  
to the following:

1. This matter was originally filed on July 26, 2022, in Washington State Superior  
Court in King County, and removed by certain Defendants on September 16, 2022. Dkt. #1.

2. Pursuant to Fed. R. Civ. P. 4(m), if a defendant has not been served within 90  
days of the commencement of the case, the court must either dismiss the defendant without

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1 prejudice or extend the time for service for an appropriate period if good cause is shown for the  
2 failure to serve.

3 3. In this case, since the commencement of this action, Plaintiffs have made diligent  
4 efforts to locate Defendant Dan Johnson and secure a waiver of service of process or serve Mr.  
5 Johnson. Plaintiffs have searched public records, including, among other documents, records  
6 secured related to this lawsuit and address databases on the internet. Notwithstanding, Plaintiffs  
7 have been unable to locate a valid and current address for Defendant Dan Johnson.

8 4. Here, "90 days after the case is filed" is December 15, 2022.

9 5. Plaintiffs believe that during the course of discovery they will secure Mr.  
10 Johnson's current residential address, or his last known residence, through which Plaintiffs will  
11 be able to effectuate service on Mr. Johnson.

12 6. "[D]istrict courts have broad discretion under General Rule 4(m) to extend time  
13 for service even without a showing of good cause." *United States v. 2,164 Watches, More or  
14 Less*, 366 F.3d 767, 772 (9th Cir. 2004).

15 7. In light of the foregoing, the undersigned hereby stipulate and agree to extend the  
16 deadline for Plaintiffs to serve Defendant Dan Johnson by an additional sixty (60) days.

17 IT IS SO STIPULATED this 15th day of December, 2022.

18 GALANDA BROADMAN, PLLC

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**ORDER**

Pursuant to the Stipulation above, the Court orders that the deadline for Plaintiffs to serve named Defendant Dan Johnson is hereby extended by an additional sixty (60) days.

DATED this 16th day of December, 2022.



BENJAMIN H. SETTLE  
United States District Judge

STIUPLATED MOTION AND ORDER TO  
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